

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

STIPULATED MOTION TO EXCEED PAGE LIMIT

1. Presently pending is the motion of Chad DuBois (“Mr. DuBois”) to dismiss the first amended complaint (the “Complaint”) filed by Erik A. Ahlgren (“Mr. Ahlgren”) in this matter (the “Motion to Dismiss”). [ECF No. 55.]

2. The Motion to Dismiss is 25 pages long.

3. Mr. Ahlgren has filed a brief in opposition to the Motion to Dismiss, which, respectively, is 26 pages long. [ECF No. 69].

4. Counsel for Mr. DuBois has commenced drafting a brief in reply to Mr. Ahlgren’s opposition, but is concerned about endeavoring to confine the brief to ten pages, per Local Rule

7007-1(A), desiring instead to submit a brief of not more than fifteen pages (excluding a cover page, tables of contents and authorities, and a certificate of service).

5. Counsel for the parties have conferred and Mr. Ahlgren is amenable to Mr. DuBois' request to exceed the page limit set forth in Local Rule 7007-1.

6. Accordingly, Messrs. Ahlgren and DuBois hereby move the Court, by stipulation, for an order extending the permissible page limit, for a reply brief, to fifteen pages, exclusive of a cover page, tables of contents and authorities, and a certificate of service.

Dated: February 4, 2025

/s/ Peter D. Kieselbach (signed w/ express permission)

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Counsel for Plaintiff

Date: February 4, 2025

/s/ Maurice B. VerStandig
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Counsel for Mr. DuBois

CERTIFICATE OF SERVICE

The undersigned certifies that on February 4, 2025, the above document was served on all counsel of record via CM/ECF.

/s/ Maurice B. VerStandig
Maurice B. VerStandig